



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

March 14, 2008

Reply to  
Attn Of: ETPA-088

Ref: 06-015-AFS

Dennis E. Bschor, Regional Forester  
USDA Forest Service  
Alaska Region, Tongass National Forest  
648 Mission Street  
Ketchikan, Alaska 99901

Dear Mr. Bschor:

The U.S. Environmental Protection Agency (EPA) has reviewed the **Final Environmental Impact Statement (FEIS) and Tongass Land and Resource Management Plan (TLMP) Amendment, and the Record of Decision (ROD)** for the Tongass National Forest in southeast Alaska (CEQ No. 20080056) according to our responsibilities and authorities under Section 309 of the Clean Air Act (CAA) and the National Environmental Policy Act (NEPA). The FEIS considered the seven alternatives identified in the Draft EIS, with some modification. These alternatives provided a wide-range of levels of resource protection and timber production for the future management of the 16.8 million acre forest. The Forest Service's Selected Alternative (Alternative 6) is similar to that presented in the Draft EIS, but with four substantial modifications.

In our April 30, 2007, comment letter on the Draft EIS and Proposed TLMP, EPA expressed concerns with the proposed high and moderate intensity land use designations (LUD), increased road development, and associated impacts to aquatic and terrestrial habitats and water quality, with two of the action alternatives (Alternative 5 and 6), as well as the lack of other alternatives to address the fundamental key issues identified by the Forest Service (Alternatives 4 and 7). We also recommended that additional information be included in the FEIS regarding how impacts will be minimized, and how monitoring and adaptive management strategies would be employed.

EPA appreciates the challenge for the Forest Service to develop a plan to direct the management of such a vast resource, as well as to adequately respond to the 84,500 comments it received from public, tribal and private stakeholders. We commend the Forest Service for the extensive collaboration process it undertook to revise the TLMP, and for the innovative decisions that it has made in moving forward with managing the Tongass National Forest.

The FEIS and the final amended TLMP addresses many of the concerns raised by EPA in our draft letter. While not the environmentally preferred alternative (identified in Record of Decision as Alternative 1), EPA believes that the adaptive and phased approach developed by the

Forest Service in the ROD will further resource sustainability while providing for reasonable commercial and private interests, in response to demonstrated demand. It also more carefully considers roadless, high value areas and resources by maintaining protections under the more probable harvest scenarios, thus reducing the need for higher intensity LUDs and road development in roadless areas. Lastly, it ensures that monitoring of the implementation, effectiveness, and validity of assumptions of the standards and guidelines will occur. Also, changes will be made as necessary to achieve the goals of the TLMP.

EPA appreciates the opportunity to provide comments on the Final Environmental Impact Statement and Tongass Land and Resource Management Plan Amendment. If you have questions or concerns regarding these comments, please contact Jennifer Curtis of my staff at (907) 271-6324 or via email at [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov).

Sincerely,

/s/

Christine Reichgott, Manager  
NEPA Review Unit

cc: Lee Kramer, Project Manager, Tongass National Forest